

**PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS  
HERETO TO DETERMINE WHETHER THIS OBJECTION  
AFFECTS YOUR CLAIM(S)**

Harvey R. Miller  
Stephen Karotkin  
Joseph H. Smolinsky  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

Attorneys for Debtors  
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----x  
In re : Chapter 11 Case No.  
: :  
MOTORS LIQUIDATION COMPANY, *et al.* : 09-50026 (REG)  
f/k/a General Motors Corp., *et al.* :  
: :  
Debtors. : (Jointly Administered)  
: :  
-----x

**NOTICE OF DEBTORS' EIGHTY-NINTH OMNIBUS OBJECTION TO  
CLAIMS AND MOTION REQUESTING ENFORCEMENT OF BAR DATE ORDERS**  
**(Late-Filed Claims)**

**PLEASE TAKE NOTICE** that on September 17, 2010, Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (the “**Debtors**”), filed their eighty-ninth omnibus objection to expunge certain claims and motion requesting enforcement of Bar Date Orders<sup>1</sup> (the “**Eighty-Ninth Omnibus Objection to**

<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Eighty-Ninth Omnibus Objection to Claims.

Claims”), and that a hearing (the “**Hearing**”) to consider the Eighty-Ninth Omnibus Objection to Claims will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **October 26, 2010 at 9:45 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

**PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE EIGHTY-NINTH OMNIBUS OBJECTION TO CLAIMS AND MOTION REQUESTING ENFORCEMENT OF BAR DATE ORDERS TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR IN EXHIBIT “A” ANNEXED THERETO.**

PLEASE TAKE FURTHER NOTICE that any responses to the Eighty-Ninth Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disk, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger); (iii) General Motors, LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New

York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Robert Schmidt, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq.); (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); (x) Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims, 375 Park Avenue, 35th Floor, New York, New York 10152-3500 (Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and One Thomas Circle, N.W., Suite 1100, Washington, DC 20005 (Attn: Trevor W. Swett III, Esq. and Kevin C. Maclay, Esq.); and (xi) Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, attorneys for Dean M. Tafelet in his capacity as the legal representative for future asbestos personal injury claimants, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.), so as to be received no later than **October 19, 2010, at 4:00 p.m. (Eastern Time)** (the "**Response Deadline**").

**PLEASE TAKE FURTHER NOTICE** that if no responses are timely filed and served with respect to the Eighty-Ninth Omnibus Objection to Claims or any claim set forth thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an

order substantially in the form of the proposed order annexed to the Eighty-Ninth Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York  
September 17, 2010

/s/ Joseph H. Smolinsky

Harvey R. Miller  
Stephen Karotkin  
Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

Attorneys for Debtors  
and Debtors in Possession

Harvey R. Miller  
Stephen Karotkin  
Joseph H. Smolinsky  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

Attorneys for Debtors and  
Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----x  
In re : Chapter 11 Case No.  
: :  
MOTORS LIQUIDATION COMPANY, *et al.* : 09-50026 (REG)  
f/k/a General Motors Corp., *et al.* :  
: :  
Debtors. : (Jointly Administered)  
: :  
-----x

**DEBTORS' EIGHTY-NINTH OMNIBUS OBJECTION TO CLAIMS  
AND MOTION REQUESTING ENFORCEMENT OF BAR DATE ORDERS**  
(Late-Filed Claims)

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM.  
CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON THE  
EXHIBIT ANNEXED TO THIS OBJECTION.**

TO THE HONORABLE ROBERT E. GERBER,  
UNITED STATES BANKRUPTCY JUDGE:

Motors Liquidation Company (f/k/a General Motors Corporation) ("MLC") and its affiliated debtors, as debtors in possession (collectively, the "Debtors"), respectfully represent:

**Relief Requested**

1. The Debtors file this eighty-ninth omnibus objection to certain claims and motion requesting enforcement of Bar Date Orders (as defined below) (the “**Eighty-Ninth Omnibus Objection to Claims**”), pursuant to section 502(b) of title 11, United States Code (the “**Bankruptcy Code**”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed against the Initial Debtors (as defined below) in these chapter 11 cases (the “**Procedures Order**”) [Docket No. 4180], this Court’s order deeming applicable the Procedures Order to the Realm/Encore Debtors (as defined below) (the “**Realm/Encore Order**”) [Docket No. 4841], this Court’s order approving the procedures relating to the filing of proofs of claim against the Initial Debtors (the “**Initial Debtors Bar Date Order**”) [Docket No. 4079], this Court’s order approving the procedures relating to the filing of proofs of claim against the Realm/Encore Debtors (the “**Realm/Encore Bar Date Order**”) [Docket No. 4586], and this Court’s supplemental order to the Initial Debtors Bar Date Order approving the procedures relating to the filing of certain proofs of claim relating to certain properties of the Debtors (the “**Property Bar Date Order**,” and collectively with the Initial Debtors Bar Date Order and the Realm/Encore Bar Date Order, the “**Bar Date Orders**”) [Docket No. 4681] seeking entry of an order disallowing and expunging the claims listed on **Exhibit “A”** annexed hereto.<sup>1</sup>

---

<sup>1</sup> Creditors can obtain copies of the cover page of any proof of claim filed against the Debtors’ bankruptcy estates on the Debtors’ claims register on the website maintained by the Debtors’ claims agent, [www.motorsliquidation.com](http://www.motorsliquidation.com). A link to the claims register is located under the “Claims Information” tab. Creditors without access to the Internet may request a copy of the cover page of any proof of claim by mail to The Garden City Group, Inc., Motors Liquidation Company Claims Agent, P.O. Box 9386, Dublin, Ohio 43017-4286 or by calling The Garden City Group, Inc. at 1-703-286-6401.

2. The Debtors have examined the proofs of claim identified on Exhibit "A" and have determined that the proofs of claim listed under the heading "*Claims to be Disallowed and Expunged*" (collectively, the "**Late-Filed Claims**") were filed after the Court-imposed deadlines for filing proofs of claim as set forth in the applicable Bar Date Orders. Because the Late-Filed Claims fail to comply with the Bar Date Orders, the Debtors request that consistent with the express terms of each of the Bar Date Orders, they be disallowed and expunged in their entirety. Further, the Debtors reserve all of their rights to object on any other basis to any Late-Filed Claims as to which the Court does not grant the relief requested herein.

### **Jurisdiction**

3. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

### **Background**

4. On June 1, 2009, four of the Debtors (the "**Initial Debtors**")<sup>2</sup> commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, and on October 9, 2009, two additional Debtors (the "**Realm/Encore Debtors**")<sup>3</sup> commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, which cases are jointly administered with those of the Initial Debtors under Case Number 09-50026 (REG). On September 15, 2009, the Initial Debtors filed their schedules of assets and liabilities and statements of financial affairs, which were amended on October 4, 2009. On October 15, 2009, the Realm/Encore Debtors filed their schedules of assets and liabilities and statements of financial affairs.

---

<sup>2</sup> The Initial Debtors are Motors Liquidation Company (f/k/a General Motors Corporation), MLCS, LLC (f/k/a Saturn, LLC), MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation), and MLC of Harlem, Inc. (f/k/a Chevrolet-Saturn of Harlem, Inc.).

<sup>3</sup> The Realm/Encore Debtors are Remediation and Liability Management Company, Inc., and Environmental Corporate Remediation Company, Inc.

5. On September 16, 2009, this Court entered the Initial Debtors Bar Date Order establishing November 30, 2009 as the deadline for each person or entity to file a proof of claim in the Initial Debtors' cases, including governmental units (the "**Initial Debtors Bar Date**"). On December 2, 2009, this Court entered the Realm/Encore Bar Date Order establishing February 1, 2010 (the "**Realm/Encore Bar Date**") as the deadline for each person or entity to file a proof of claim in the Realm/Encore Debtors' cases (except governmental units, as defined in section 101(27) of the Bankruptcy Code, for which the Court established April 16, 2010, the "**Realm/Encore Governmental Bar Date**"). On December 18, 2009, this Court entered the Property Bar Date Order establishing February 10, 2010 as the deadline for entities residing adjacent to or in the proximity of the material manufacturing properties of the Debtors as set forth in the Property Bar Date Notice (as defined below) (the "**Properties**") to file a proof of claim with respect to the Properties (the "**Property Bar Date**," and collectively with the Initial Debtors Bar Date, the Realm/Encore Bar Date, and the Realm/Encore Governmental Bar Date, the "**Bar Dates**").

6. In order to be timely-filed, proofs of claim must have been "actually received" on or before the applicable Bar Date. (Initial Debtors Bar Date Ord. at 3 (emphasis in original); Realm/Encore Bar Date Ord. at 3 (emphasis in original); Property Bar Date Ord. at 2 (emphasis in original).) The Bar Date Orders also expressly provide that any holder of a claim against the Debtors who is required, but fails, to file a proof of such claim in accordance with the applicable Bar Date Order on or before the applicable Bar Date shall forever be barred, estopped, and enjoined from asserting such claim against each of the Debtors and their respective estates (or filing a Proof of Claim with respect thereto) (Initial Debtors Bar Date Ord. at 5;

Realm/Encore Bar Date Ord. at 5; Property Bar Date Ord. at 4.) Copies of the Bar Date Orders were made publicly available at [www.motorsliquidationdocket.com](http://www.motorsliquidationdocket.com).

7. Each of the claimants received actual notice of the Initial Debtors Bar Date Order (the “**Initial Debtors Bar Date Notice**,” a copy of which is annexed hereto as **Exhibit “B”**), the Realm/Encore Bar Date Order (the “**Realm/Encore Bar Date Notice**,” a copy of which is annexed hereto as **Exhibit “C”**, and the “**Realm/Encore Local Bar Date Notice**,” a copy of which is annexed hereto as **Exhibit “D”**), and/or the Property Bar Date Order (the “**Property Bar Date Notice**,” a copy of which is annexed hereto as **Exhibit “E”**; and collectively with the Initial Debtors Bar Date Notice, the Realm/Encore Bar Date Notice, and the Realm/Encore Local Bar Date Notice, the “**Bar Date Notices**”), as applicable, via mail. The Initial Debtors Bar Date Notice was also published in the *Financial Times*, *The Wall Street Journal* (Global Edition—North America, Europe, and Asia), *The New York Times* (National), *USA Today* (Monday through Thursday, National), *Detroit Free Press/Detroit News*, *Le Journal de Montreal* (French), *Montreal Gazette* (English), *The Globe and Mail* (National), and *The National Post*. The Realm/Encore Bar Date Notice was also published in *USA Today* (National Edition) and *The New York Times* (National Edition). The Realm/Encore Local Bar Date Notice was also published in the newspapers set forth in the Realm/Encore Local Bar Date Notice. The Property Bar Date Notice was also published in the newspapers set forth in the Property Bar Date Notice.

8. Reflecting the Bar Date Orders’ severe consequences regarding missing the deadline for filing proofs of claim, each of the Bar Date Notices clearly and unambiguously notified claimants that proofs of claim against the Debtors must be received on or before the applicable Bar Date (Initial Debtors Bar Date Notice at 3; Realm/Encore Bar Date Notice at 3;

Realm/Encore Local Bar Date Notice at 3; Property Bar Date Notice at 3.) and prominently stated in bold-face type that any creditor who fails to file a proof of claim on or before the applicable Bar Date will be forever barred from asserting the claim or filing a proof of claim with respect to the claim. (Initial Debtors Bar Date Notice at 4; Realm/Encore Bar Date Notice at 4; Realm/Encore Local Bar Date Notice at 3; Property Bar Date Notice at 4.) While a notice period of only 35 days of a bar date is recommended by the Second Amended Procedural Guidelines for Filing Requests for Bar Date Orders in the United States Bankruptcy Court for the Southern District of New York, in this case, the Debtors provided creditors 65 days notice of the Initial Debtors Bar Date, 51 days notice of the Realm/Encore Bar Date, 125 days notice of the Realm/Encore Governmental Bar Date, and 44 days notice of the Property Bar Date.

9. On October 6, 2009, this Court entered the Procedures Order, which authorizes the Debtors, among other things, to file omnibus objections to no more than 100 claims at a time, under various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order. On January 19, 2010, this Court also entered the Realm/Encore Order, which deems as applicable the Procedures Order to the Realm/Encore Debtors.

**The Relief Requested Should Be Approved by the Court**

10. A filed proof of claim is “deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). If an objection refuting at least one of the claim’s essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009); *In re Adelphia Commc’ns Corp.*, Ch. 11 Case No. 02-41729 (REG), 2007 Bankr. LEXIS 660 at \*15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000).

11. Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1).

Moreover, Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that “proof of such claim is not timely filed.” 11 U.S.C. § 502(b)(1).

12. The United States Supreme Court of the United States has established a standard for allowing a late claim, requiring a showing of excusable neglect. *Pioneer Inv. Servs. Co. v. Brunswick Assocs.*, 507 U.S. 380 (1993). The *Pioneer* Court established five factors in consideration of what constitutes excusable neglect: (1) the degree of prejudice to the debtors; (2) the length of the delay and its potential impact on judicial proceedings; (3) the reason for the delay, including whether it was within the reasonable control of the claimant; (4) whether the claimant acted in good faith; and (5) if a claimant had counsel, whether a claimant should be penalized for their counsel’s mistake or neglect. *Id.* at 385, 387. In other words, simple inadvertence is not sufficient grounds. Here, the Debtors have already filed their chapter 11 plan of liquidation and none of the claimants have sought leave of the Court to allow their late-filed claim. It would be severely prejudicial to other claimants and these judicial proceedings to now have to reserve distributions while the standards of excusable neglect are adjudicated as to each and every one of the hundreds of late-filing claimants.

13. In applying *Pioneer*, the Second Circuit has adopted what can be characterized as a hard line test for determining whether a party’s neglect is excusable. *In re Enron Corp.*, 419 F.3d 115, 122-23 (2d Cir. 2005). The Second Circuit focuses on the “reason for the delay” and cautions that rarely will the equities favor a claimant who fails to follow a

clear court rule. *Id.* at 123; *Redhead v. Conf. of Seventh-Day Adventists*, 360 Fed. Appx. 232, 235 (2d Cir. 2010) (same).

14. “Bar dates are ‘critically important to the administration of a successful chapter 11 case.’” (Memorandum Decision Denying Motions for Leave to File Late Claims, No. 08-13555 (JMP) [Docket No. 9150], *In re Lehman Bros. Holdings, Inc.*, Case No. 08-13555 (JMP), 2010 WL 2000326 at \*2 (Bankr. S.D.N.Y. May 20, 2010) (quoting *In re Musicland Holding Corp.*, 356 B.R. 603, 607 (Bankr. S.D.N.Y. 2006)).) A bar date is more than a “procedural gauntlet” and functions as “an integral part of the reorganization process.” *In re Hooker Invs., Inc.*, 937 F.2d 833, 840 (2d Cir. 1991). A bar date enables debtors to determine with reasonable promptness, efficiency and finality what claims will be made against their estates—a determination without which they cannot effectively reorganize. *In re Keene Corp.*, 188 B.R. 903, 907 (Bankr. S.D.N.Y. 1995). Accordingly, bar dates are strictly enforced in the Second Circuit. *See id.*; *In re Lehman Bros. Holdings, Inc.*, 2010 WL 2000326 at \*2; *In re Musicland Holding Corp.*, 356 B.R. at 607 (“The bar date is akin to a statute of limitations, and must be strictly enforced.”).

15. The Bar Date Orders specifically require proofs of claim to be **actually received** on or before the applicable Bar Dates. (Initial Debtors Bar Date Ord. at 3; Realm/Encore Bar Date Ord. at 3; Property Bar Date Ord. at 2.) Claimants were provided notice of the Bar Date Orders, including the deadline to file proofs of claim and a clear warning that failure to comply with the applicable Bar Date would result in their claims being barred. (*See* Initial Debtors Bar Date Ord. at 5; Realm/Encore Bar Date Ord. at 5; Property Bar Date Ord. at 4.) Nevertheless, the holders of the Late-Filed Claims filed their proofs of claim subsequent to the applicable Bar Date.

16. Because the Late-Filed Claims fail to comply with the Bar Date Orders and are thus untimely, the Debtors request that the Court enforce its prior Bar Date Orders and disallow and expunge in their entirety the Late-Filed Claims listed on Exhibit "A."

**Notice**

17. Notice of this Eighty-Ninth Omnibus Objection to Claims has been provided to each claimant listed on Exhibit "A" and parties in interest in accordance with the Fourth Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures, dated August 24, 2010 [Docket No. 6750]. The Debtors submit that such notice is sufficient and no other or further notice need be provided.

18. No previous request for the relief sought herein has been made by the Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: New York, New York  
September 17, 2010

/s/ Joseph H. Smolinsky  
Harvey R. Miller  
Stephen Karotkin  
Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

Attorneys for Debtors  
and Debtors in Possession

**EXHIBIT A**

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ABRAHAM, TAWANDA 133 OMEGA CT SANTEE, SC 29142	68015	Motor Liquidation Company	\$30,000.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$30,000.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/2/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

ALEXANDER TOLBERT 267 WILSON AVE OVIEDO, FL 32765	69304	Motor Liquidation Company	\$4,000.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$4,000.00 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: 12/5/2009  
 Official Claim Date: 12/10/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ALLAN L FRUMAN 9420 RESEDA BLVD # 292 NORTHRIDGE, CA 91324	70096	Motor Liquidation Company	\$5,000.00 (S) \$0.00 (A) \$0.00 (P) \$5,000.00 (U) \$10,000.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 3/5/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

ALLEN T MIOTKE 26180 CLARKSTON DR UNIT 23306 BONITA SPRINGS, FL 34135	68746	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$5,837,110.00 (U) \$5,837,110.00 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/4/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ALVIN SPIKES JR 3210 ROBERTS ST BEAUMONT, TX 77701	69968	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$138,408.82 (U) \$138,408.82 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 2/1/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

ANDERSEN, JONATHAN 500 GREENWICH DR RICHMOND HILL, GA 31324	68670	Motor Liquidation Company	\$100,000.00 (S) \$0.00 (A) \$0.00 (P) \$20,000.00 (U) \$120,000.00 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	---	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/4/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
CHAMBERS, EDDIE	68509	Motor Liquidation Company	\$24,200.00 (S)	Late-Filed Claim	Pgs. 1-5
FREMAN WILLIAM J 2201 6TH AVE S BIRMINGHAM, AL 35233			\$0.00 (A)		
			\$0.00 (P)		
			\$50,800.00 (U)		
			\$75,000.00 (T)		

**Additional Claim Information**

Applicable Bar Date: 11/30/2009

Postmark Date: 12/1/2009

Official Claim Date: 12/2/2009

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

CHESTNUT, JUSTUS 84 TWIN HILL DR WILLINGBORO, NJ 08046	70297	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P)	Late-Filed Claim	Pgs. 1-5
			\$250,000.00 (U)		
			\$250,000.00 (T)		

**Additional Claim Information**

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 5/13/2010

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
COLEMAN, DAVID W 26070 COLEMAN ST ELKMONT, AL 35620	69558	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$3,000.00 (P) \$0.00 (U) \$3,000.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/21/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
DANIEL MEYER 1501 SWAGOSA DR MAQUOKETA, IA 52060	69066	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$500,000.00 (U) \$500,000.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/7/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

DANIEL MEYER 1501 SWAGOSA DR MAQUOKETA, IA 52060	69067	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$250,000.00 (U) \$250,000.00 (T)	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/7/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
DANIEL MEYER 1501 SWAGOSA DR MAQUOKETA, IA 52060	69069	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$101,000.00 (U) \$101,000.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/7/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

DANIEL MEYER 1501 SWAGOSA DR MAQUOKETA, IA 52060	69071	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$110,910.00 (U) \$110,910.00 (T)	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/7/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
DONNA TOCARCHICK 9605 DEER TRL HASLETT, MI 48840 UNITED STATES OF AMERICA	68343	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$120,920.00 (U) \$120,920.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 12/3/2009

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

DOROTHY E ELLIOTT 7655 WATSON RD APT 315 ST LOUIS, MO 63119	70006	Motor Liquidation Company	\$10,325.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$10,325.00 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 2/8/2010

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ESURANCE A/S/O MARIE VELOZ ATTN TODD AYRES PO BOX 2890 ROCKLIN, CA 95677	69790	Motor Liquidation Company	\$4,639.95 (S) \$0.00 (A) \$337.00 (P) \$0.00 (U) \$4,976.95 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 1/19/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

FAFF, MICHAEL M 475 WASHINGTON BLVD WHITE LAKE, MI 48386	69604	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$29.89 (P) \$0.00 (U) \$29.89 (T)	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/22/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
FELIPE ESQUIBEL 8500 TURNPIKE DR WESTMINSTER, CO 80031	70259	Motor Liquidation Company	\$9,950.00 (S) \$0.00 (A) \$0.00 (P) \$3,800.00 (U) \$13,750.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 4/23/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

FISHER, HOWARD G 9378 ELMWOOD CT STANWOOD, MI 49346	70033	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$91,063.00 (U) \$91,063.00 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 2/12/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
FORD CERISE MELVINA PO BOX 24597 DETROIT, MI 48224	70229	Motor Liquidation Company	\$125,000.00 (S) \$0.00 (A) \$120,000.00 (P) \$40,000.00 (U) \$285,000.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 4/14/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

GALVIN, SHERRI RANAE PO BOX 144 SUNRISE BEACH, MO 65079	70145	Motor Liquidation Company	\$20,000.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$20,000.00 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 3/22/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
GARCIA JOSEFINA	69079	Motor Liquidation Company	\$0.00 (S)	Late-Filed Claim	Pgs. 1-5
GARCIA, JOSEFINA			\$0.00 (A)		
BUFETE OLIVERO BARRETO			\$0.00 (P)		
PO BOX 270379					
SAN JUAN, PR 00927			\$300,000.00 (U)		
			\$300,000.00 (T)		

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: 12/2/2009  
 Official Claim Date: 12/7/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

GEORGIA B SNOW 1400 S PLYMOUTH AVE APT 216 ROCHESTER, NY 14611	69601	MLC of Harlem, Inc.	\$0.00 (S) \$0.00 (A) \$6,000.00 (P) \$0.00 (U) \$6,000.00 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/22/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
GERALD A KOLB 14137 RANDALL DR STERLING HTS, MI 48313	69719	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$185,798.00 (U) \$185,798.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 1/5/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

GOODLOW SONIA L 7769 DOVE DR RIVERDALE, GA 30274	69556	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$82,000.00 (U) \$82,000.00 (T)	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/21/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
GWENDOLYN R COZART 6015 E 40TH TER KANSAS CITY, MO 64129	70267	Remediation And Liability Management Company, Inc.	\$30,000.00 (S) \$0.00 (A) \$0.00 (P) \$17,000.00 (U) \$47,000.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 2/1/2010

Postmark Date: N/A

Official Claim Date: 5/1/2010

Docket Number of Affidavit of Service: 4675

Notice Provided and Date of Service:

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
HART, JOHN 491 GROSVENOR RD ROCHESTER, NY 14610	69879	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$299.16 (P) \$22,767.62 (U) \$23,066.78 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 1/27/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

HART, JOHN 491 GROSVENOR RD ROCHESTER, NY 14610	70099	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$299.16 (P) \$22,767.62 (U) \$23,066.78 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 3/5/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
HEATH, VERONICA 1237 LINCOLN AVE BELOIT, WI 53511	67825	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$10,000.00 (P) \$0.00 (U) \$10,000.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: 12/1/2009  
 Official Claim Date: 12/1/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

HEATH, YVETTE 1237 LINCOLN AVE BELOIT, WI 53511	67824	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$10,000.00 (P) \$0.00 (U) \$10,000.00 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: 12/1/2009  
 Official Claim Date: 12/1/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
HORNER JEANNETTE	68512		\$67,382.00 (S)		
HORNER, WHITNEY			\$0.00 (A)		
2698 SANTA CLARA DRIVE			\$0.00 (P)		
SANTA CLARA, UT 84755			\$0.00 (U)		
			\$67,382.00 (T)		
			Unliquidated		

**Additional Claim Information**

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 12/1/2009

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

HORNER, JEANNETTE	68514		\$51,762.00 (S)		
2698 SANTA CLARA DR			\$0.00 (A)		
SANTA CLARA, UT 84765			\$0.00 (P)		
			\$0.00 (U)		
			\$51,762.00 (T)		

**Additional Claim Information**

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 12/1/2009

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
HORNER, WHITNEY 2698 SANTA CLARA DR SANTA CLARA, UT 84765	68513	Motor Liquidation Company	\$15,720.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$15,720.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/1/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

HOWARD FISHER 9378 ELMWOOD CT STANWOOD, MI 49346	70032	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$225,000.00 (U) \$225,000.00 (T)	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 2/12/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
INTEVA PRODUCTS LLC 1401 CROOKS ROAD ATTN GENERAL COUNSEL TRAY, MI 48084	67604	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$120,000.00 (U) \$120,000.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/1/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
INTRACORP 5144 COLLECTION CENTER DR CHICAGO, IL 60693	70286	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$5,712.96 (P) \$0.00 (U) \$5,712.96 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 5/13/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

INTRACORP 5144 COLLECTION CENTER DR CHICAGO, IL 60693	70288	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$192.50 (P) \$0.00 (U) \$192.50 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 5/14/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
JACKSON TERESA 3528 KAREN ST LANSING, MI 48911	70041	Motor Liquidation Company	\$10,000.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$10,000.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 2/16/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

JAMES DAWSON 2380 BARNSBURY EAST LANSING, MI 48823 UNITED STATES OF AMERICA	68828	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$292,670.00 (U) \$292,670.00 (T)	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: 12/1/2009  
 Official Claim Date: 12/4/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
JAMIE SEALS 4088 LINK DR BRIGHTON, MI 48114	70086	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$5,000.00 (P) \$0.00 (U) \$5,000.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 3/3/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

JOHN M CHASE JR ESQ CONSERVATOR AND GUARDIAN OF EVAN WARRENCHUK ATTN B A TYLER TYLER LAW FIRM PLLC 3001 W BIG BEAVER RD #704 TROY, MI 48084	70141	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$200,000.00 (U) \$200,000.00 (T)	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 3/20/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
JULIA MAURA TOD 1000 S HILLCREST CT #112 BLDG 4 HOLLYWOOD, FL 33021	65862	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$15,000.00 (P) \$15,000.00 (U) \$30,000.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: 12/1/2009  
 Official Claim Date: 12/7/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

KAREN RAPP SCHULTES 1114 BEDFORD GROSSE POINTE PARK, MI 48230	69579	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$20,000.00 (P) \$0.00 (U) \$20,000.00 (T) Unliquidated	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/21/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
KELLY BOTHWELL 30344 COUNTY HIGHWAY L16 MOORHEAD, IA 51558	70001	Motor Liquidation Company	\$5,000.00 (S) \$0.00 (A) \$5,000.00 (P) \$0.00 (U) \$10,000.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 2/8/2010

LANHAM, PORTIA RR 1 BOX 83E POCA, WV 25159	68398	Motor Liquidation Company	\$17,721.09 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$17,721.09 (T)	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009

Postmark Date: 12/1/2009

Official Claim Date: 12/3/2009

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
LARRY HOFMAN 5685 330TH STREET SANBORN, IA 51248	70218	Motor Liquidation Company	\$4,800.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$4,800.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 4/12/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

LATITUDE SUBROGATION TPA AUTO-OWNERS 1760 S TELEGRAPH RD STE 104 BLOOMFIELD HILLS, MI 48302	69769	Motor Liquidation Company	\$17,346.00 (S) \$0.00 (A) \$17,346.00 (P) \$0.00 (U) \$34,692.00 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	---	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 1/12/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
LAUZON, DOUG WALLBRIDGE WALLBRIDGE 24 PINE STREET SOUTH TIMMINS ON P4N 2J8 CANADA , CANADA	69996	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$5,000,000.00 (U) \$5,000,000.00 (T)	Late-Filed Claim	Pgs. 1-5
				Unliquidated	

**Additional Claim Information**

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 2/8/2010

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

LLOYD, TERESA J 6531 TULIP TREE CT DAYTON, OH 45424	69321	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$10,950.00 (P) \$0.00 (U) \$10,950.00 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009

Postmark Date: 12/7/2009

Official Claim Date: 12/10/2009

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
LOBERT, MARGARET 2190 MEMORIAL DR APT A4 CLARKSVILLE, TN 37043	69759	Motor Liquidation Company	\$11,048.42 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$11,048.42 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 1/11/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

LOGAN, TAUREEN 1883 IONA DR SE ATLANTA, GA 30316	69129	Motor Liquidation Company	\$2,930.89 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$2,930.89 (T)	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: 12/5/2009  
 Official Claim Date: 12/7/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
LUGO AUTO SALES INC ALFREDO CARDONA 220 AVE LOS ATLETICOS SAN GERMAN, PR 00683	69135	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P)  \$1,228,678.72 (U)  \$1,228,678.72 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: 12/2/2009  
 Official Claim Date: 12/7/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

MAGDOLEEN ZAYID 3797 DAMAS DR COMMERC TWP, MI 48382	65801	Motor Liquidation Company	\$50,000.00 (S) \$0.00 (A) \$0.00 (P)  \$0.00 (U)  \$50,000.00 (T)  Unliquidated	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: 12/3/2009  
 Official Claim Date: 12/7/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
MARSH, KARL C/O LOVINS LAW FIRM PA 120 COLLEGE ST ASHEVILLE, NC 28801	67662	Motor Liquidation Company	\$350,000.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$350,000.00 (T) Unliquidated	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 12/1/2009

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

MARSH, TINA RENEE C/O LOVINS LAW FIRM PA 120 COLLEGE ST ASHEVILLE, NC 28801	67661	Motor Liquidation Company	\$350,000.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$350,000.00 (T) Unliquidated	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 12/1/2009

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
MC LEAN MARYHELEN A 1133 AMERICAN ELM ST LAKE ORION, MI 48360	70231	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$600.00 (P) \$0.00 (U) \$600.00 (T) Unliquidated	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 4/15/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

MCCASTER, CYNTHIA 326 E PHILADELPHIA BLVD FLINT, MI 48505	68201	Motor Liquidation Company	\$65.00 (S) \$0.00 (A) \$0.00 (P) \$4,435.00 (U) \$4,500.00 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	---	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/2/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
MCPHERSON, ANTHONY 10 WISTERIA PL MARRERO, LA 70072	70097	Motor Liquidation Company	\$5,800.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$5,800.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 3/5/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

MCPHERSON, ANTHONY 10 WISTERIA PL MARRERO, LA 70072	70098	Motor Liquidation Company	\$5,800.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$5,800.00 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 3/5/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
MERCEDES VITE 232 LONE STAR PL EL PASO, TX 79907	70170	Motor Liquidation Company	\$4,574.79 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$4,574.79 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 3/29/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

MONTY R & LISA K HENDERSON 7340 S ALBANY AVE CHICAGO, IL 60629	70303	Motor Liquidation Company	\$5,000.00 (S) \$0.00 (A) \$0.00 (P) \$5,000.00 (U) \$10,000.00 (T)	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	---	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 5/29/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
MS ELVIRA D POSADA 1617 N WABASH AVE KOKOMO, IN 46901	70023	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$360,000.00 (U) \$360,000.00 (T) Unliquidated	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 2/5/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

MT BROTHERS LLC ATTN: CORPORATE OFFICER/AUTHORIZED AGENT 1441 ALLEN DR TROY, MI 48083	69663	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$183,735.00 (U) \$183,735.00 (T)	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/30/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
NINA DUNCAN 367 NICHOLS RD NAUVOO, AL 35587	70215	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$4,500.00 (P) \$0.00 (U) \$4,500.00 (T) Unliquidated	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 4/9/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

NOVA CONSULTANTS INC 21580 NOVI ROAD #300 NOVI, MI 48375	70194	Remediation And Liability Management Company, Inc.	\$17,001.30 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$17,001.30 (T)	Late-Filed Claim	Pgs. 1-5
--	-------	---	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 2/1/2010  
 Postmark Date: N/A  
 Official Claim Date: 4/3/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
PATRICIA ANN CHAPMAN P.O. BOX 283 COTTAGEVILLE, WV 25239 UNITED STATES OF AMERICA	68921	Motor Liquidation Company	\$5,705.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$5,705.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: 12/1/2009  
 Official Claim Date: 12/7/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

PAYNE, CHRIS 517 N MATUBBA ST ABERDEEN, MS 39730	69345	Motor Liquidation Company	\$3,400.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$3,400.00 (T)	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/7/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
PIERRO, JOHN NEIMAN JOSEPH H 17936 80TH RD JAMAICA, NY 11432	69842	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$10,970,000.00 (U) \$10,970,000.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 1/25/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

PITNEY BOWES LEASING 314 HARWOOD AVE S SUITE 200 AJAX ON LIS 2J1 CANADA , CANADA	69186	Motor Liquidation Company	\$44,661.49 (S) \$0.00 (A) \$0.00 (P) \$44,661.49 (U) \$89,322.98 (T)	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	---	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: 12/3/2009  
 Official Claim Date: 12/8/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ROBERT BOLTON 5196 AINTREE RD ROCHESTER, MI 48306	68431	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$138,000.00 (U) \$138,000.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/3/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

ROBERT HINTON PO BOX 3142 KALAMAZOO, MI 49003	70239	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$15,000,000.00 (U) \$15,000,000.00 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 4/20/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ROBERT L SCHADE 3345 DELEVAN DR SAGINAW, MI 48603	68630	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$320,447.00 (U) \$320,447.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: 12/2/2009  
 Official Claim Date: 12/4/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

ROBERT WYATT 8181 DEERWOOD RD CLARKSTON, MI 48348	68183	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$145,163.00 (U) \$145,163.00 (T) Unliquidated	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/2/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ROBERTS SAUNDRA 15505 LINDSAY ST DETROIT, MI 48227	69279	Motor Liquidation Company	\$32,280.80 (S) \$0.00 (A) \$0.00 (P) \$11,737.12 (U) \$44,017.92 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 12/9/2009

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ROBERTS, RONALD 166 HILL SIDE AVE WEST GROVE, PA 19390	69667	Motor Liquidation Company	\$2,800.00 (S) \$0.00 (A) \$0.00 (P) \$2,800.00 (U) \$5,600.00 (T) Unliquidated	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/31/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

ROBERTS, RONALD 166 HILLSIDE AVE WEST GROVE, PA 19390	69668	Motor Liquidation Company	\$2,275.56 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$2,275.56 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/31/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ROBERTSON, JOAN M C/O WENIG SALTIEL LLP 26 COURT STREET STE 502 BROOKLYN, NY 11242	69085	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$78,285.60 (P) \$0.00 (U) \$78,285.60 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: 12/4/2009  
 Official Claim Date: 12/7/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

ROSEMARY TERRY PO BOX 442090 DETROIT, MI 48244	69772	Motor Liquidation Company	\$717.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$717.00 (T)	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 1/14/2010  
 Docket Number of Affidavit of Service: 4675  
 Notice Provided and Date of Service:

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
RUCKER, DARLENE PO BOX 17221 WARREN, OH 44482	69217	Motor Liquidation Company	\$14,598.88 (S) \$0.00 (A)  \$14,598.88 (P)  \$0.00 (U)  \$29,197.76 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/2/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

SADOUGHI MARZEYH SADOUGHI, MARZYEH 7825 FAY AVE STE 200 LA JOLLA, CA 92037	69803	Motor Liquidation Company	\$17,000.00 (S) \$0.00 (A)  \$0.00 (P)  \$0.00 (U)  \$17,000.00 (T)  Unliquidated	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 1/19/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
SATURN OF ARLINGTON IN BUFFALO GRO 915 W DUNDEE RD BUFFALO GROVE, IL UNITED STATES OF AMERICA	67943	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$4,988,279.00 (U) \$4,988,279.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 12/1/2009

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

SCHRAFT, CHAD 5717 SMOKE RANCH RD LAS VEGAS, NV 89108	69236	Motor Liquidation Company	\$4,590.00 (S) \$0.00 (A) \$0.00 (P) \$910.00 (U) \$5,500.00 (T) Unliquidated	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 12/2/2009

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
SHANNON STEFAN C/O ANCHOR GENERAL INSURANCE COMPANY PO BOX 509020 SAN DIEGO, CA 92150	69397	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$15,440.68 (P) \$0.00 (U) \$15,440.68 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/14/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

STEEVES, JOHN 23 DURANT ST LAWRENCE, MA 01841	69686	Motor Liquidation Company	\$800.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$800.00 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 1/4/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
SWANSON, EDITH A PO BOX 893077 OKLAHOMA CITY, OK 73189	69261	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$1,000,000.00 (U) \$1,000,000.00 (T) Unliquidated	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/9/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

SWETT, KRISTY 1351 W ALLAMANDA BLVD AVON PARK, FL 33825	68641	Motor Liquidation Company	\$5,000.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$5,000.00 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/4/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
TEETER, MARILYN K 18410 LISTER AVE EASTPOINTE, MI 48021	68357	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$170,000.00 (U) \$170,000.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/3/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

THOMPSON, REGINA 201 SCHOOL ST LEXINGTON, AL 35648	69888	Motor Liquidation Company	\$5,500.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$5,500.00 (T)	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 1/28/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
VERLIN DAHMES 2771 COUNTY ROAD 120 NE ALEXANDRIA, MN 56308	69964	Motor Liquidation Company	\$1,200.70 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$1,200.70 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 2/1/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

WARRENCHUK, EVAN TYLER LAW FIRM PLLC 3001 W BIG BEAVER RD STE 704 TROY, MI 48084	70140	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$200,000.00 (U) \$200,000.00 (T)	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 3/20/2010  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
WENDY HARPER	68192	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$3,000,000.00 (P) \$0.00 (U) \$3,000,000.00 (T)	Late-Filed Claim	Pgs. 1-5
MOUNT ST MARY'S HOSPITAL 861 FAIRFIELD ROAD N 407 VICTORIA, BC V8V 5A9 CANADA					
,					
CANADA					

**Additional Claim Information**

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 12/2/2009

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

WILLIAMS, PATRICIA A 9600 CORNELL ST TAYLOR, MI 48180	69778	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$249,600.00 (U) \$249,600.00 (T)	Late-Filed Claim	Pgs. 1-5
---	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009

Postmark Date: N/A

Official Claim Date: 1/14/2010

Docket Number of Affidavit of Service: 4238

Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**CLAIMS TO BE DISALLOWED AND EXPUNGED**

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
WILLIAMS, THELMA 6109 OLDTOWN ST DETROIT, MI 48224	69235	Motor Liquidation Company	\$15,265.00 (S) \$0.00 (A) \$7,000.00 (P) \$6,265.00 (U) \$28,530.00 (T)	Late-Filed Claim	Pgs. 1-5

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/2/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

WYATT, ROBERT J 8181 DEERWOOD RD CLARKSTON, MI 48348	68182	Motor Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$135,000.00 (U) \$135,000.00 (T) Unliquidated	Late-Filed Claim	Pgs. 1-5
--	-------	---------------------------------	--	------------------	----------

**Additional Claim Information**

Applicable Bar Date: 11/30/2009  
 Postmark Date: N/A  
 Official Claim Date: 12/2/2009  
 Docket Number of Affidavit of Service: 4238  
 Notice Provided and Date of Service: Bar Date Notice on 9/25/2009

<b>CLAIMS TO BE DISALLOWED AND EXPUNGED</b>	<b>94</b>	<b>\$1,510,860.87 (S)</b>
		<b>\$0.00 (A)</b>
		<b>\$3,349,591.83 (P)</b>
		<b>\$49,166,726.39 (U)</b>
		<b>\$54,027,179.09 (T)</b>

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**EXHIBIT B**

**Initial Debtors Bar Date Notice**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X-----  
In re : Chapter 11 Case No.  
: :  
MOTORS LIQUIDATION COMPANY : 09-50026 (REG)  
f/k/a GENERAL MOTORS CORPORATION, :  
et al., :  
Debtors. : (Jointly Administered)  
:-----X-----

**NOTICE OF DEADLINES FOR FILING PROOFS OF CLAIM  
(INCLUDING CLAIMS UNDER SECTION 503(B)(9) OF THE BANKRUPTCY CODE)**

TO ALL PERSONS AND ENTITIES WITH CLAIMS (INCLUDING CLAIMS UNDER SECTION 503(B)(9) OF THE BANKRUPTCY CODE) AGAINST A DEBTOR SET FORTH BELOW:

Name of Debtor	Case Number	Tax Identification Number	Other Names Used by Debtors in the Past 8 Years
Motors Liquidation Company (f/k/a <b>General Motors Corporation</b> )	09-50026	38-0572515	General Motors Corporation GMC Truck Division NAO Fleet Operations GM Corporation GM Corporation-GM Auction Department National Car Rental National Car Sales Automotive Market Research
MLCS, LLC (f/k/a <b>Saturn, LLC</b> )	09-50027	38-2577506	Saturn, LLC Saturn Corporation Saturn Motor Car Corporation GM Saturn Corporation Saturn Corporation of Delaware
MLCS Distribution Corporation (f/k/a <b>Saturn Distribution Corporation</b> )	09-50028	38-2755764	Saturn Distribution Corporation
MLC of Harlem, Inc. (f/k/a <b>Chevrolet-Saturn of Harlem, Inc.</b> )	09-13558	20-1426707	Chevrolet-Saturn of Harlem, Inc. CKS of Harlem

PLEASE TAKE NOTICE THAT, on September 16, 2009, the United States Bankruptcy Court for the Southern District of New York (the “**Court**”), having jurisdiction over the chapter 11 cases of Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”) entered an order (the “**Bar Date Order**”) establishing (i) **November 30, 2009, at 5:00 p.m. (Eastern Time)** as the last date and time for each person or entity (including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts) to file a proof of claim (“**Proof of Claim**”) based on prepetition claims, including a claim under section 503(b)(9) of the Bankruptcy Code, as described more fully below (a “**503(b)(9) Claim**”), against any of the Debtors (the “**General Bar Date**”); and (ii) **November 30, 2009, at 5:00 p.m. (Eastern Time)** as the last date and time for each governmental unit (as defined in section 101(27) of the Bankruptcy Code) to file a Proof of Claim based on prepetition claims against any of the Debtors (the “**Governmental Bar Date**” and, together with the General Bar Date, the “**Bar Dates**”).

The Bar Date Order, the Bar Dates and the procedures set forth below for the filing of Proofs of Claim apply to all claims against the Debtors (other than those set forth below as being specifically excluded) that arose prior to **June 1, 2009**, the date on which the Debtors commenced their cases under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”).

**If you have any questions relating to this Notice, please feel free to contact AlixPartners at 1-800-414-9607 or by e-mail at claims@motorsliquidation.com. In addition, you may contact the Official Committee of Unsecured Creditors through its website at www.motorsliquidationcreditorscommittee.com or at 1-212-715-3275.**

**YOU SHOULD CONSULT AN ATTORNEY IF YOU HAVE ANY QUESTIONS, INCLUDING WHETHER YOU SHOULD FILE A PROOF OF CLAIM.**

## **1. WHO MUST FILE A PROOF OF CLAIM**

You **MUST** file a **Proof of Claim** to vote on a chapter 11 plan filed by the Debtors or to share in any of the Debtors' estates if you have a claim that arose prior to **June 1, 2009**, including a 503(b)(9) Claim, and it is not one of the other types of claims described in Section 2 below. Acts or omissions of the Debtors that arose before **June 1, 2009** may give rise to claims against the Debtors that must be filed by the applicable Bar Date, notwithstanding that such claims may not have matured or become fixed or liquidated or certain prior to **June 1, 2009**.

Pursuant to section 101(5) of the Bankruptcy Code and as used in this Notice, the word "claim" means: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured. Further, claims include unsecured claims, secured claims, priority claims, and 503(b)(9) Claims (as defined in Section 2(d) below).

## **2. WHO NEED NOT FILE A PROOF OF CLAIM**

You need not file a Proof of Claim if:

- (a) Your claim is listed on the Schedules (as defined below) and (i) is **not** described in the Schedules as "disputed," "contingent," or "unliquidated," (ii) you do **not** dispute the amount or nature of the claim set forth in the Schedules, and (iii) you do **not** dispute that the claim is an obligation of the specific Debtor against which the claim is listed on the Schedules;
- (b) Your claim has been paid in full;
- (c) You hold an interest in any of the Debtors, which interest is based exclusively upon the ownership of common or preferred stock, membership interests, partnership interests, or warrants or rights to purchase, sell or subscribe to such a security or interest; **provided, however**, that interest holders who wish to assert claims (as opposed to ownership interests) against any of the Debtors that arise out of or relate to the ownership or purchase of an interest, including claims arising out of or relating to the sale, issuance, or distribution of the interest, must file Proofs of Claim on or before the applicable Bar Date, unless another exception identified herein applies;
- (d) You hold a claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an administrative claim; **provided, however, 503(b)(9) Claims are subject to the General Bar Date as provided above.** Section 503(b)(9) provides in part: "...there shall be allowed administrative expenses...including...(9) the value of any goods received by the debtor within 20 days before the date of commencement of a case under this title in which the goods have been sold to the debtor in the ordinary course of such debtor's business." **Accordingly, if you have a 503(b)(9) Claim, you must file a Proof of Claim on or before the General Bar Date;**
- (e) You hold a claim that has been allowed by an order of the Court entered on or before the applicable Bar Date;
- (f) You hold a claim against any of the Debtors for which a separate deadline is fixed by the Court (whereupon you will be required to file a Proof of Claim by that separate deadline);
- (g) You are a Debtor in these cases having a claim against another Debtor;
- (h) You are an affiliate (as defined in section 101(2) of the Bankruptcy Code) of any Debtor as of the Bar Date;

- (i) You hold a claim for which you have already properly filed a Proof of Claim against any of the Debtors with the Clerk of the Court or The Garden City Group, Inc., the Debtors' claims agent, utilizing a claim form that substantially conforms to the Proof of Claim Form (as defined below) or Official Form 10; or
- (j) You hold a claim that is limited exclusively to the repayment of principal, interest and other fees and expenses on or under any agreements (a "**Debt Claim**") governing any debt security issued by any of the Debtors pursuant to an indenture (together, the "**Debt Instruments**") if the indenture trustee or similar fiduciary under the applicable indenture or fiscal and paying agency agreement files a Proof of Claim against the applicable Debtor, on or before the Bar Date, on account of all Debt Claims against such Debtor under the applicable Debt Instruments, provided, however, that any holder of a Debt Claim wishing to assert a claim arising out of or relating to a Debt Instrument, other than a Debt Claim, shall be required to file a Proof of Claim with respect to such claim on or before the Bar Date, unless another exception identified herein applies. Debt Instruments include those agreements listed at the end of this Notice.

**YOU SHOULD NOT FILE A PROOF OF CLAIM IF YOU DO NOT HAVE A CLAIM AGAINST THE DEBTORS.****THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THAT THE DEBTORS OR THE COURT BELIEVE THAT YOU HAVE A CLAIM.****3. EXECUTORY CONTRACTS AND UNEXPIRED LEASES**

If you hold a claim arising from the rejection of an executory contract or unexpired lease, you must file a Proof of Claim based on such rejection by the later of (i) the applicable Bar Date, and (ii) the date which is **thirty days** following the entry of the order approving such rejection or you will be forever barred from doing so. Notwithstanding the foregoing, if you are a party to an executory contract or unexpired lease and you wish to assert a claim on account of unpaid amounts accrued and outstanding as of June 1, 2009 pursuant to that executory contract or unexpired lease (other than a rejection damages claim), you must file a Proof of Claim for such amounts on or before the applicable Bar Date unless an exception identified above applies.

**4. WHEN AND WHERE TO FILE**

All Proofs of Claim must be filed so as to be actually received on or before the applicable Bar Date at the following address:

If by overnight courier or hand delivery to:

The Garden City Group, Inc.  
Attn: Motors Liquidation Company Claims Processing  
5151 Blazer Parkway, Suite A  
Dublin, Ohio 43017

If by first-class mail, to:

The Garden City Group, Inc.  
Attn: Motors Liquidation Company Claims Processing  
P.O. Box 9386  
Dublin, Ohio 43017-4286

Or if by hand delivery to:

United States Bankruptcy Court, SDNY  
One Bowling Green  
Room 534  
New York, New York 10004

Proofs of Claim will be deemed timely filed only if actually received by The Garden City Group, Inc. or the Court on or before the applicable Bar Date. Proofs of Claim may not be delivered by facsimile, telecopy, or electronic mail transmission.

## 5. WHAT TO FILE

If you file a Proof of Claim, your filed Proof of Claim must: (i) be written in the English language; (ii) be denominated in lawful currency of the United States; (iii) conform substantially to the form provided with this Notice (“**Proof of Claim Form**”) or Official Bankruptcy Form No. 10; (iv) state the Debtor against which it is filed; (v) set forth with specificity the legal and factual basis for the alleged claim; (vi) include supporting documentation or an explanation as to why such documentation is not available; and (vii) be **signed** by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant.

IF YOU ARE ASSERTING A CLAIM AGAINST MORE THAN ONE DEBTOR, SEPARATE PROOFS OF CLAIM MUST BE FILED AGAINST EACH SUCH DEBTOR AND YOU MUST IDENTIFY ON YOUR PROOF OF CLAIM THE SPECIFIC DEBTOR AGAINST WHICH YOUR CLAIM IS ASSERTED AND THE CASE NUMBER OF THAT DEBTOR’S BANKRUPTCY CASE. A LIST OF THE NAMES OF THE DEBTORS AND THEIR CASE NUMBERS IS SET FORTH ABOVE.

Additional Proof of Claim Forms may be obtained at [www.uscourts.gov/bkforms/](http://www.uscourts.gov/bkforms/) or [www.motorsliquidation.com](http://www.motorsliquidation.com).

**YOU SHOULD ATTACH TO YOUR COMPLETED PROOF OF CLAIM FORM COPIES OF ANY WRITINGS UPON WHICH YOUR CLAIM IS BASED. IF THE DOCUMENTS ARE VOLUMINOUS, YOU SHOULD ATTACH A SUMMARY.**

## 6. CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM BY THE APPLICABLE BAR DATE

*Except with respect to claims of the type set forth in Section 2 above, any creditor who fails to file a Proof of Claim on or before the applicable Bar Date in the appropriate form in accordance with the procedures described in this Notice for any claim such creditor holds or wishes to assert against each of the Debtors, will be forever barred – that is, forbidden – from asserting the claim against each of the Debtors and their respective estates (or filing a Proof of Claim with respect to the claim), and each of the Debtors and their respective chapter 11 estates, successors, and property will be forever discharged from any and all indebtedness or liability with respect to the claim, and the holder will not be permitted to vote to accept or reject any chapter 11 plan filed in these chapter 11 cases, participate in any distribution in any of the Debtors’ chapter 11 cases on account of the claim, or receive further notices with respect to any of the Debtors’ chapter 11 cases.*

## 7. THE DEBTORS’ SCHEDULES, ACCESS THERETO, AND CONSEQUENCES OF AMENDMENT THEREOF

You may be listed as the holder of a claim against one or more of the Debtors in the Debtors’ Schedules of Assets and Liabilities and/or Schedules of Executory Contracts and Unexpired Leases (collectively, the “**Schedules**”). If you rely on the Debtors’ Schedules, it is your responsibility to determine that the claim is accurately listed in the Schedules.

As set forth above, if you agree with the classification and amount of your claim as listed in the Debtors’ Schedules, and if you do not dispute that your claim is only against the specified Debtor, and if your claim is not described as “disputed”, “contingent”, or “unliquidated”, you need not file a Proof of Claim. Otherwise, or if you decide to file a Proof of Claim, you must do so before the Bar Date in accordance with the procedures set forth in this Notice.

Copies of the Schedules may be examined by interested parties on the Court’s electronic docket for the Debtors’ chapter 11 cases, which is posted on the Internet at [www.motorsliquidation.com](http://www.motorsliquidation.com) and [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov) (a PACER login and password are required and can be obtained through the PACER Service Center at [www.pacer.psc.uscourts.gov](http://www.pacer.psc.uscourts.gov)). Copies of the Schedules may also be examined by interested parties between the hours of 9:00 a.m. and 4:30 p.m. (Eastern Time) at the office of the Clerk of the Bankruptcy Court, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 511, New York, New York 10004. Copies of the Debtors’ Schedules may also be obtained by written request to the Debtors’ claims agent at the address and telephone number set forth below:

The Garden City Group, Inc.  
Attn: Motors Liquidation Company  
P.O. Box 9386  
Dublin, Ohio 43017-4286  
1-703-286-6401

In the event that the Debtors amend their Schedules to (a) designate a claim as disputed, contingent, unliquidated, or undetermined, (b) change the amount of a claim reflected therein, (c) change the classification of a claim reflected therein, or (d) add a claim that was not listed on the Schedules, the Debtors will notify you of the amendment. In such case, the deadline for you to file a Proof of Claim on account of any such claim is the later of (a) the applicable Bar Date and (b) the date that is **thirty days** after the Debtors provide notice of the amendment.

**A holder of a possible claim against the Debtors should consult an attorney regarding any matters not covered in this Notice, such as whether the holder should file a Proof of Claim.**

DATED: September 16, 2009  
New York, New York

BY ORDER OF THE COURT

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

ATTORNEYS FOR DEBTORS AND  
DEBTORS IN POSSESSION

**Certain Debt Instruments**

	<b>Debt Instrument</b>	<b>CUSIP, ISIN, or Swiss Security Numbers</b>
1	Indenture, dated as of Nov. 15, 1990, between GM and Citibank as indenture trustee	CUSIP Nos. 370442AN5, 370442AJ4, 370442AR6, 37045EAG3, 37045EAST7
2	Indenture, dated as of Dec. 7, 1995, between GM and Citibank as indenture trustee	CUSIP Nos. 370442AT2, 370442AU9, 370442AV7, 370442AZ8, 370442BB0, 370442816, 370442774, 370442766, 370442758, 370442741, 370442733, 370442725, 370442BQ7, 370442BT1, 370442717, 370442BW4, 370442BS3, 370442121, 370442691
3	Trust Indenture, dated as of July 1, 1995, between Michigan Strategic Fund and Dai-Ichi Kangyo Trust Company of New York (\$58,800,000 Multi-Modal Interchangeable Rate Pollution Control Refunding Revenue Bonds)	CUSIP No. 594693AQ6
4	Indenture of Trust, dated as of July 1, 1994, between City of Moraine, Ohio and Dai-Ichi Kangyo Trust Company of New York (\$12,500,000 Solid Waste Disposal Revenue Bonds)	CUSIP No. 616449AA2
5	Indenture of Trust, dated as of July 1, 1999, between City of Moraine, Ohio and Dai-Ichi Kangyo Trust Company of New York (\$10,000,000 Solid Waste Disposal Revenue Bonds)	CUSIP No. 616449AB0
6	Trust Indenture, dated as of Dec. 1, 2002, among City of Fort Wayne, Indiana, JPMorgan Chase Bank and Bank One Trust Company, N.A., (\$31,000,000 Pollution Control Revenue Refunding Bonds)	CUSIP No. 455329AB8
7	Trust Indenture, dated as of Mar. 1, 2002, between Ohio Water Development Authority and JPMorgan Chase Bank (\$20,040,000 State of Ohio Pollution Control Refunding Revenue Bonds)	CUSIP No. 667596AU2
8	Indenture of Trust, dated as of Dec. 1, 2002, between Ohio Water Development Authority and JPMorgan Chase Bank (\$46,000,000 State of Ohio Solid Waste Revenue Bonds)	CUSIP No. 67759ABC2
9	Trust Indenture, dated as of Apr. 1, 1984, among City of Indianapolis, Indiana, Bankers Trust Company and The Indiana National Bank (\$1,400,000 Pollution Control Revenue Bonds)	CUSIP No. 455329AB8

10	Fiscal and Paying Agency Agreement, dated as of July 3, 2003, between GM, Deutsche Bank AG London, as fiscal agent and paying agent, and Banque Générale du Luxembourg S.A., as paying agent	ISIN Nos. XS0171942757, XS0171943649
11	Fiscal and Paying Agency Agreement, dated as of July 10, 2003, between GM Nova Scotia Finance Company, GM, as guarantor, Deutsche Bank Luxembourg S.A., as fiscal agent and paying agent, and Banque Générale du Luxembourg S.A., as paying agent	ISIN Nos. XS0171922643, XS0171908063.
12	Bond Purchase and Paying Agency Agreement dated May 28, 1986 between GM and Credit Suisse	Swiss Security No. 876 926

**EXHIBIT C**

**Realm/Encore Bar Date Notice**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X-----  
**In re** : **Chapter 11 Case No.**  
**MOTORS LIQUIDATION COMPANY, et al.,** : **09-50026 (REG)**  
f/k/a **General Motors Corp., et al.** :  
  
**Debtors.** : **(Jointly Administered)**  
:  
-----X-----  
**In re** : **Chapter 11 Case No.**  
**REMEDIATION AND LIABILITY** : **09- 50029 (REG)**  
**MANAGEMENT COMPANY, INC.,** :  
  
**Debtor.** :  
:  
-----X-----  
**In re** : **Chapter 11 Case No.**  
**ENVIRONMENTAL CORPORATE** : **09-50030 (REG)**  
**REMEDIATION COMPANY, INC.,** :  
  
**Debtor.** :  
:  
-----X-----

**NOTICE OF DEADLINES FOR FILING PROOFS OF CLAIM  
(INCLUDING CLAIMS UNDER SECTION 503(b)(9) OF THE BANKRUPTCY CODE)**

TO ALL PERSONS AND ENTITIES WITH CLAIMS (INCLUDING CLAIMS UNDER SECTION 503(b)(9) OF THE BANKRUPTCY CODE) AGAINST A DEBTOR SET FORTH BELOW:

Name of Debtor	Case Number	Tax Identification Number	Other Names Used by Debtors in the Past 8 Years
Remediation and Liability Management Company, Inc. (subsidiary of <b>General Motors Corporation</b> )	09-50029 (REG)	38-2529430	Uptown Land Development Corporation
Environmental Corporate Remediation Company, Inc. (subsidiary of <b>General Motors Corporation</b> )	09-50030 (REG)	41-1650789	GM National Hawaii, Inc. NCRS Hawaii, Inc.

PLEASE TAKE NOTICE THAT, on December 2, 2009, the United States Bankruptcy Court for the Southern District of New York (the “Court”) having jurisdiction over the chapter 11 cases of Remediation and Liability Management Company, Inc. and Environmental Corporate Remediation Company, Inc., as debtors in possession (each subsidiaries of **General Motors Corporation**) (collectively, the “**REALM/ENCORE Debtors**”) entered an order (the “**REALM/ENCORE Bar Date Order**”) establishing (i) **February 1, 2010, at 5:00 p.m. (Eastern Time)** as the last date and time for each person or entity (including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts) to file a proof of claim (“**Proof of Claim**”) based on prepetition claims including a claim under section 503(b)(9) of the Bankruptcy Code (as described more fully below (a “**503(b)(9) Claim**”)), against any of the

REALM/ENCORE Debtors (the “**REALM/ENCORE General Bar Date**”); and (ii) **April 16, 2010, at 5:00 p.m. (Eastern Time)** as the last date and time for each governmental unit (as defined in section 101(27) of the Bankruptcy Code) to file a Proof of Claim based on prepetition claims against any of the REALM/ENCORE Debtors (the “**REALM/ENCORE Governmental Bar Date**” and, together with the REALM/ENCORE General Bar Date, the “**REALM/ENCORE Bar Dates**”).

The REALM/ENCORE Bar Date Order, the REALM/ENCORE Bar Dates and the procedures set forth below for the filing of Proofs of Claim apply to all claims against the REALM/ENCORE Debtors (other than those set forth below as being specifically excluded) that arose prior to **October 9, 2009**, the date on which the REALM/ENCORE Debtors commenced their cases under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”).

**The REALM/ENCORE Debtors were subsidiaries of General Motors Corporation. The properties owned by the REALM/ENCORE Debtors may have been known to you as property of General Motors Corporation.**

**If you have any questions relating to this Notice, please feel free to contact the Debtors at 1-800-414-9607 or by e-mail at claims@motorsliquidation.com. In addition, you may contact the Official Committee of Unsecured Creditors through its website at www.motorsliquidationcreditorscommittee.com or at 1-212-715-3275.**

**YOU SHOULD CONSULT AN ATTORNEY IF YOU HAVE ANY QUESTIONS, INCLUDING WHETHER YOU SHOULD FILE A PROOF OF CLAIM.**

## **1. WHO MUST FILE A PROOF OF CLAIM**

You **MUST** file a **Proof of Claim** to vote on a chapter 11 plan filed by the REALM/ENCORE Debtors or to share in any of the REALM/ENCORE Debtors’ estates if you have a claim that arose prior to **October 9, 2009**, including a 503(b)(9) Claim, and it is not one of the other types of claims described in Section 2 below. Acts or omissions of the REALM/ENCORE Debtors that occurred before **October 9, 2009** may give rise to claims against the REALM/ENCORE Debtors that must be filed by the applicable Bar Date, notwithstanding that such claims may not have matured or become fixed or liquidated or certain prior to **October 9, 2009**.

Pursuant to section 101(5) of the Bankruptcy Code and as used in this Notice, the word “claim” means: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured. Further, claims include unsecured claims, secured claims, priority claims, and 503(b)(9) Claims.

## **2. WHO NEED NOT FILE A PROOF OF CLAIM**

You need not file a Proof of Claim if:

- (a) Your claim is listed on the Schedules (as defined below) and (i) is **not** described in the Schedules as “disputed,” “contingent,” or “unliquidated,” (ii) you do **not** dispute the amount or nature of the claim set forth in the Schedules, and (iii) you do **not** dispute that the claim is an obligation of the specific REALM/ENCORE Debtor against which the claim is listed on the Schedules;
- (b) Your claim has been paid in full;
- (c) You hold a claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an administrative claim; **provided, however, 503(b)(9) Claims are subject to the REALM/ENCORE General Bar Date as provided above.** Section 503(b)(9) provides in part: “...there shall be allowed administrative expenses...including...(9) the value of any goods received by the debtor within 20 days before the date of commencement of a case under this title in which the goods have been sold to the debtor in the ordinary course of such debtor’s business.” **Accordingly, if you have a 503(b)(9) Claim, you must file a Proof of Claim on or before the REALM/ENCORE General Bar Date;**
- (d) You hold a claim that has been allowed by an order of the Court entered on or before the applicable REALM/ENCORE Bar Date;

- (e) You hold a claim against any of the REALM/ENCORE Debtors for which a separate deadline is fixed by the Court (whereupon you will be required to file a Proof of Claim by that separate deadline);
- (f) You are a REALM/ENCORE Debtor in these cases having a claim against another Debtor;
- (g) You are an affiliate (as defined in section 101(2) of the Bankruptcy Code) of any REALM/ENCORE Debtor as of the REALM/ENCORE Bar Date; or
- (h) You hold a claim for which you have already properly filed a Proof of Claim against any of the REALM/ENCORE Debtors with the Clerk of the Court or The Garden City Group, Inc., the Debtors' claims agent, utilizing a claim form that substantially conforms to the Proof of Claim Form (as defined below) or Official Form 10.

**YOU SHOULD NOT FILE A PROOF OF CLAIM IF YOU DO NOT HAVE A CLAIM AGAINST THE REALM/ENCORE DEBTORS.**

**THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THAT THE REALM/ENCORE DEBTORS OR THE COURT BELIEVE THAT YOU HAVE A CLAIM.**

### **3. EXECUTORY CONTRACTS AND UNEXPIRED LEASES**

If you hold a claim arising from the rejection of an executory contract or unexpired lease, you must file a Proof of Claim based on such rejection by the later of (i) the applicable REALM/ENCORE Bar Date, and (ii) the date which is **thirty days** following the entry of the order approving such rejection or you will be forever barred from doing so. Notwithstanding the foregoing, if you are a party to an executory contract or unexpired lease and you wish to assert a claim on account of unpaid amounts accrued and outstanding as of October 9, 2009 pursuant to that executory contract or unexpired lease (other than a rejection damages claim), you must file a Proof of Claim for such amounts on or before the applicable REALM/ENCORE Bar Date unless an exception identified above applies.

### **4. WHEN AND WHERE TO FILE**

All Proofs of Claim must be filed so as to be **actually received** on or before the applicable REALM/ENCORE Bar Date at the following address:

If by overnight courier or hand delivery to:

The Garden City Group, Inc.  
Attn: Motors Liquidation Company Claims Processing  
5151 Blazer Parkway, Suite A  
Dublin, Ohio 43017

If by first-class mail, to:

The Garden City Group, Inc.  
Attn: Motors Liquidation Company Claims Processing  
P.O. Box 9386  
Dublin, Ohio 43017-4286

Or if by hand delivery to:

United States Bankruptcy Court, SDNY  
One Bowling Green  
Room 534  
New York, New York 10004

Proofs of Claim will be deemed timely filed only if **actually received** by The Garden City Group, Inc. or the Court on or before the applicable REALM/ENCORE Bar Date. Proofs of Claim may **not** be delivered by facsimile, telecopy, or electronic mail transmission.

### **5. WHAT TO FILE**

If you file a Proof of Claim, your filed Proof of Claim must: (i) be written in the English language; (ii) be denominated in lawful currency of the United States; (iii) conform substantially to the form provided with this Notice ("**Proof of Claim Form**") or Official Bankruptcy Form No. 10; (iv) state the REALM/ENCORE Debtor against which it is filed; (v) set forth with specificity the legal and factual basis for the alleged claim; (vi) include supporting documentation or an explanation as to why such documentation is not available; and (vii) be **signed** by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant.

IF YOU ARE ASSERTING A CLAIM AGAINST MORE THAN ONE REALM/ENCORE DEBTOR, SEPARATE PROOFS OF CLAIM MUST BE FILED AGAINST EACH SUCH REALM/ENCORE DEBTOR AND YOU MUST IDENTIFY ON YOUR PROOF OF CLAIM THE SPECIFIC REALM/ENCORE DEBTOR AGAINST WHICH YOUR CLAIM IS ASSERTED AND THE CASE NUMBER OF THAT REALM/ENCORE DEBTOR'S BANKRUPTCY CASE. THE NAMES OF THE REALM/ENCORE DEBTORS AND THEIR CASE NUMBERS ARE SET FORTH ABOVE.

Additional Proof of Claim Forms may be obtained at [www.uscourts.gov/bkforms/](http://www.uscourts.gov/bkforms/) or [www.motorsliquidation.com](http://www.motorsliquidation.com).

**YOU SHOULD ATTACH TO YOUR COMPLETED PROOF OF CLAIM FORM COPIES OF ANY WRITINGS UPON WHICH YOUR CLAIM IS BASED. IF THE DOCUMENTS ARE VOLUMINOUS, YOU SHOULD ATTACH A SUMMARY.**

## **6. CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM BY THE APPLICABLE BAR DATE**

*Except with respect to claims of the type set forth in Section 2 above, any creditor who fails to file a Proof of Claim on or before the applicable REALM/ENCORE Bar Date in the appropriate form in accordance with the procedures described in this Notice for any claim such creditor holds or wishes to assert against each of the REALM/ENCORE Debtors, will be forever barred – that is, forbidden – from asserting the claim against each of the REALM/ENCORE Debtors and their respective estates (or filing a Proof of Claim with respect to the claim), and each of the REALM/ENCORE Debtors and their respective chapter 11 estates, successors, and property will be forever discharged from any and all indebtedness or liability with respect to the claim, and the holder will not be permitted to vote to accept or reject any chapter 11 plan filed in these chapter 11 cases, participate in any distribution in any of the REALM/ENCORE Debtors' chapter 11 cases on account of the claim, or receive further notices with respect to any of the REALM/ENCORE Debtors' chapter 11 cases.*

## **7. THE REALM/ENCORE DEBTORS' SCHEDULES, ACCESS THERETO, AND CONSEQUENCES OF AMENDMENT THEREOF**

You may be listed as the holder of a claim against one or more of the REALM/ENCORE Debtors in the REALM/ENCORE Debtors' Schedules of Assets and Liabilities and/or Schedules of Executory Contracts and Unexpired Leases (collectively, the "Schedules"). If you rely on the REALM/ENCORE Debtors' Schedules, it is your responsibility to determine that the claim is accurately listed in the Schedules.

As set forth above, if you agree with the classification and amount of your claim as listed in the REALM/ENCORE Debtors' Schedules, and if you do not dispute that your claim is only against the specified REALM/ENCORE Debtor, and if your claim is not described as "disputed", "contingent", or "unliquidated", you need not file a Proof of Claim. Otherwise, or if you decide to file a Proof of Claim, you must do so before the applicable REALM/ENCORE Bar Date in accordance with the procedures set forth in this Notice.

Copies of the Schedules may be examined by interested parties on the Court's electronic docket for the REALM/ENCORE Debtors' chapter 11 cases, which is posted on the Internet at [www.motorsliquidation.com](http://www.motorsliquidation.com) and [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov) (a PACER login and password are required and can be obtained through the PACER Service Center at [www.pacer.psc.uscourts.gov](http://www.pacer.psc.uscourts.gov)). Copies of the Schedules may also be examined by interested parties between the hours of 9:00 a.m. and 4:30 p.m. (Eastern Time) at the office of the Clerk of the Bankruptcy Court, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 511, New York, New York 10004. Copies of the REALM/ENCORE Debtors' Schedules may also be obtained by written request to the REALM/ENCORE Debtors' claims agent at the address and telephone number set forth below:

The Garden City Group, Inc.  
Attn: Motors Liquidation Company  
P.O. Box 9386  
Dublin, Ohio 43017-4286  
1-703-286-6401

In the event that the REALM/ENCORE Debtors amend their Schedules to (a) designate a claim as disputed, contingent, unliquidated, or undetermined, (b) change the amount of a claim reflected therein, (c) change the classification of a claim reflected therein, or (d) add a claim that was not listed on the Schedules, the REALM/ENCORE Debtors will notify you of the amendment. In such case, the deadline for you to file a Proof of Claim on account of any such claim is the later of (a) the applicable REALM/ENCORE Bar Date and (b) the date that is **thirty days** after the REALM/ENCORE Debtors provide notice of the amendment.

**A holder of a possible claim against the REALM/ENCORE Debtors should consult an attorney regarding any matters not covered in this Notice, such as whether the holder should file a Proof of Claim.**

DATED: December 2, 2009  
New York, New York

BY ORDER OF THE COURT

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

ATTORNEYS FOR DEBTORS AND  
DEBTORS IN POSSESSION

**EXHIBIT D**

**Realm/Encore Local Bar Date Notice**

**YOU ARE RECEIVING THIS NOTICE BECAUSE YOU RESIDE NEAR ONE OF THE PROPERTIES LISTED AT THE END OF THIS NOTICE WHICH WAS FORMERLY OWNED BY GENERAL MOTORS.**

**THE DEBTORS ARE NOT AWARE OF ANY PARTICULAR HARM TO YOU OR YOUR PROPERTY AS A RESULT OF IT BEING LOCATED NEAR A GENERAL MOTORS PROPERTY OR ANY OTHER PARTICULAR REASON WHY YOU MAY HAVE A CLAIM. HOWEVER, IF YOU BELIEVE YOU HAVE A CLAIM, YOU SHOULD FILE A CLAIM ON OR BEFORE FEBRUARY 1, 2010 IN ACCORDANCE WITH THE PROCEDURES SET FORTH IN THIS NOTICE.**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re : Chapter 11 Case No.  
: :  
**MOTORS LIQUIDATION COMPANY, et al.,** : **09-50026 (REG)**  
f/k/a General Motors Corp., et al. :  
: :  
Debtors. : (Jointly Administered)  
:  
-----X  
In re : Chapter 11 Case No.  
: :  
**REMEDIATION AND LIABILITY** : **09- 50029 (REG)**  
**MANAGEMENT COMPANY, INC.,** :  
: :  
Debtor. :  
:  
-----X  
In re : Chapter 11 Case No.  
: :  
**ENVIRONMENTAL CORPORATE** : **09-50030 (REG)**  
**REMEDIATION COMPANY, INC.,** :  
: :  
Debtor. :  
:  
-----X

**NOTICE OF DEADLINE FOR FILING PROOFS OF CLAIM**

TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST A DEBTOR SET FORTH BELOW:

Name of Debtor	Case Number	Tax Identification Number	Other Names Used by Debtors in the Past 8 Years
Remediation and Liability Management Company, Inc. (subsidiary of <b>General Motors Corporation</b> )	09-50029 (REG)	38-2529430	Uptown Land Development Corporation
Environmental Corporate Remediation Company, Inc. (subsidiary of <b>General Motors Corporation</b> )	09-50030 (REG)	41-1650789	GM National Hawaii, Inc. NCRS Hawaii, Inc.

PLEASE TAKE NOTICE THAT, on December 2, 2009, the United States Bankruptcy Court for the Southern District of New York (the “**Court**”) having jurisdiction over the chapter 11 cases of Remediation and Liability Management Company, Inc. and Environmental Corporate Remediation Company, Inc., as debtors in possession (each subsidiaries of **General Motors Corporation**) (collectively, the “**REALM/ENCORE Debtors**”) entered an order (the “**Bar Date Order**”) establishing **February 1, 2010, at 5:00 p.m. (Eastern Time)** as the last date and time for each person or entity (including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts) to file a proof of claim (“**Proof of Claim**”) based on prepetition claims against any of the REALM/ENCORE Debtors (the “**Bar Date**”).

The Bar Date Order, the Bar Date and the procedures set forth below for the filing of Proofs of Claim apply to all claims against the REALM/ENCORE Debtors that arose prior to **October 9, 2009**, the date on which the REALM/ENCORE Debtors commenced their cases under chapter 11 of the United States Bankruptcy Code (the “**Bankruptcy Code**”).

**The REALM/ENCORE Debtors were subsidiaries of GENERAL MOTORS CORPORATION. The properties owned by the REALM/ENCORE Debtors may have been known to you as property of General Motors Corporation.**

**If you have any questions relating to this Notice, please feel free to contact the Debtors at 1-800-414-9607 or by e-mail at claims@motorsliquidation.com. In addition, you may contact the Official Committee of Unsecured Creditors through its website at www.motorsliquidationcreditorscommittee.com or at 1-212-715-3275.**

**YOU SHOULD CONSULT AN ATTORNEY IF YOU HAVE ANY QUESTIONS, INCLUDING WHETHER YOU SHOULD FILE A PROOF OF CLAIM.**

## **1. WHO MUST FILE A PROOF OF CLAIM**

You **MUST** file a **Proof of Claim** to vote on a chapter 11 plan filed by the REALM/ENCORE Debtors or to share in any of the REALM/ENCORE Debtors’ estates if you have a claim that arose prior to **October 9, 2009**. Acts or omissions that occurred before **October 9, 2009** may give rise to claims against the REALM/ENCORE Debtors that must be filed by **February 1, 2010**, notwithstanding that such claims may not have matured or become fixed or liquidated or certain prior to **October 9, 2009**.

Pursuant to section 101(5) of the Bankruptcy Code and as used in this Notice, the word “claim” means: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

**YOU SHOULD NOT FILE A PROOF OF CLAIM IF YOU DO NOT HAVE A CLAIM.**

**THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THAT THE DEBTORS OR THE COURT BELIEVE THAT YOU HAVE A CLAIM.**

## 2. WHEN AND WHERE TO FILE

All Proofs of Claim must be filed so as to be actually received on or before **February 1, 2010** at the following address:

If by overnight courier or hand delivery to:

The Garden City Group, Inc.  
Attn: Motors Liquidation Company Claims Processing  
5151 Blazer Parkway, Suite A  
Dublin, Ohio 43017

If by first-class mail, to:

The Garden City Group, Inc.  
Attn: Motors Liquidation Company Claims Processing  
P.O. Box 9386  
Dublin, Ohio 43017-4286

Or if by hand delivery to:

United States Bankruptcy Court, SDNY  
One Bowling Green  
Room 534  
New York, New York 10004

Proofs of Claim will be deemed timely filed only if actually received by The Garden City Group, Inc. or the Court on or before **February 1, 2010**. Proofs of Claim may not be delivered by facsimile, telecopy, or electronic mail transmission.

## 3. WHAT TO FILE

If you file a Proof of Claim, your filed Proof of Claim must: (i) be written in the English language; (ii) be denominated in dollars; (iii) conform substantially to the form provided with this Notice (“**Proof of Claim Form**”) or Official Bankruptcy Form No. 10; (iv) state the REALM/ENCORE Debtor against which it is filed; (v) set forth the factual basis for the alleged claim; (vi) include supporting documentation or an explanation as to why such documentation is not available; and (vii) be signed by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant.

Additional Proof of Claim Forms may be obtained at [www.uscourts.gov/bkforms/](http://www.uscourts.gov/bkforms/) or [www.motorsliquidation.com](http://www.motorsliquidation.com).

**YOU SHOULD ATTACH TO YOUR COMPLETED PROOF OF CLAIM FORM COPIES OF ANY WRITINGS UPON WHICH YOUR CLAIM IS BASED. IF THE DOCUMENTS ARE VOLUMINOUS, YOU SHOULD ATTACH A SUMMARY.**

## 4. CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM BY THE APPLICABLE BAR DATE

*If you do not file a Proof of Claim on or before February 1, 2010 in the appropriate form in accordance with the procedures described in this Notice for any claim you wish to assert, you will be forever prohibited and forbidden from asserting the claim in the future, and each of the Debtors and their respective chapter 11 estates, successors, and property will be forever discharged from and will not be liable or responsible for anything relating to the claim, and you will not be permitted to vote to accept or reject any chapter 11 plan filed in these chapter 11 cases, receive any distribution in any of the REALM/ENCORE Debtors' chapter 11 cases on account of your claim, or receive further notices with respect to any of the REALM/ENCORE Debtors' chapter 11 cases.*

**A holder of a possible claim should consult an attorney as to whether the holder should file a Proof of Claim.**

DATED: December 2, 2009  
New York, New York

BY ORDER OF THE COURT

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

ATTORNEYS FOR DEBTORS AND  
DEBTORS IN POSSESSION

**LIST OF PROPERTIES**

Site Name	Address	City, State Zip
6560 CASS AVENUE (NEW CENTER COMPLEX)	6560 CASS AVENUE	DETROIT, MICHIGAN 48202
BAY CITY- CROTTY STREET	1001 WOODSIDE AVENUE	BAY CITY, MICHIGAN 48708
DANVILLE CENTRAL FOUNDRY LANDFILL	I-74 @ G STREET	DANVILLE, ILLINOIS 61832
DELPHI I - COLDWATER ROAD (LANDFILL & WWTP CLOSURE)	WWTP AT 6220 HORTON STREET, LANDFILL AT 1245 EAST	FLINT, MICHIGAN 48505
DELPHI SAGINAW PLANT 2 - LANDFILL	79 WEST CENTER STREET	SAGINAW, MICHIGAN 48605
ELYRIA LANDFILL (LORAIN)	1400 LOWELL STREET	ELYRIA, OHIO 44035
FORMER DELCO CHASSIS PLANT	12950 ECKLES ROAD	LIVONIA, MICHIGAN 48150
GMPT - TOLEDO REALM PARCEL	1455 WEST ALEXIS ROAD	TOLEDO, OHIO 43612
GREENPOINT LANDFILL	77, 79 WEST CENTER STREET AND 3305, 3307 GABRIEL	SAGINAW, MICHIGAN 48602
LEEDS ASSEMBLY LAND	LAND SOUTH OF 6817 STADIUM DRIVE	KANSAS CITY, MISSOURI 64129
LEY CREEK SITE (SALINA)	FACTORY AVENUE AND/OR MALLOY ROAD EAST	SALINA, NEW YORK 13209
LINDEN ROAD	1200 SOUTH LINDEN ROAD	FLINT TOWNSHIP, MICHIGAN 48532
PEREGRINE - COLDWATER ROAD (PLANT)	1245 EAST COLDWATER ROAD (G-1245 EAST COLDWATER ROAD)	FLINT, MICHIGAN 48505
SOUTH LAGOON (MORAINA COMPLEX)	3801 DRYDEN	MORAINA, OHIO 45439
SUMMERFIELD (LAND ALONG STANLY ROAD)	STANLEY ROAD	MT. MORRIS, MICHIGAN 48458
TEXTILE ROAD LAND	BUNTON & TEXTILE ROADS	YPSILANTI, MICHIGAN 48197
TONAWANDA LANDFILL	2520 KENMORE AVENUE	TONAWANDA, NEW YORK 14207
VACANT LAND SOUTH OF VAN BORN	5000 ECORSE ROAD	BELLEVILLE, MICHIGAN 48111

Site Name	Newspaper Name	Newspaper Address	Newspaper City, State, Zip
6560 CASS AVENUE (NEW CENTER COMPLEX)	DETROIT FREE PRESS	600 WEST FORT STREET	DETROIT, MICHIGAN 48226
BAY CITY- CROTTY STREET	BAY CITY TIMES	311 5TH STREET	BAY CITY, MICHIGAN 48708
DANVILLE CENTRAL FOUNDRY LANDFILL	COMMERCIAL NEWS	17 WEST NORTH STREET	DANVILLE, ILLINOIS 61832
DELPHI I - COLDWATER ROAD (LANDFILL & WWTP CLOSURE)	FLINT JOURNAL	200 EAST 1ST STREET	FLINT, MICHIGAN 48502
DELPHI SAGINAW PLANT 2 - LANDFILL	SAGINAW NEWS	203 SOUTH WASHINGTON AVENUE	SAGINAW, MICHIGAN 48607
ELYRIA LANDFILL (LORAIN)	THE CHRONICLE-TELEGRAM	225 EAST AVENUE	ELYRIA, OHIO 44035
FORMER DELCO CHASSIS PLANT	OBSERVER & ECCENTRIC	36251 SCHOOLCRAFT ROAD LIVONIA, MICHIGAN 48150	
GMPT - TOLEDO REALM PARCEL	THE TOLEDO BLADE	541 NORTH SUPERIOR STREET	TOLEDO, OHIO 43601
GREENPOINT LANDFILL	SAGINAW NEWS	203 SOUTH WASHINGTON AVENUE	SAGINAW, MICHIGAN 48607
LEEDS ASSEMBLY LAND	KANSAS CITY BUSINESS JOURNAL	1100 MAIN STREET	KANSAS CITY, KANSAS 64105
LEY CREEK SITE (SALINA)	SYRACUSE NEW TIMES	1415 WEST GENESEE STREET	SYRACUSE, NEW YORK 13204
LINDEN ROAD	FLINT JOURNAL	200 EAST 1ST STREET	FLINT, MICHIGAN 48502
PEREGRINE - COLDWATER ROAD (PLANT)	FLINT JOURNAL	200 EAST 1ST STREET	FLINT, MICHIGAN 48502
SOUTH LAGOON (MORAINE COMPLEX)	DAYTON DAILY NEWS	45 SOUTH LUDLOW STREET DAYTON, OHIO 45402	
SUMMERFIELD (LAND ALONG STANLEY ROAD)	FLINT JOURNAL	200 EAST 1ST STREET	FLINT, MICHIGAN 48502
TEXTILE ROAD LAND	YPSILANTI COURIER	133 WEST MICHIGAN AVENUE	YPSILANTI, MICHIGAN 48197
TONAWANDA LANDFILL	TONAWANDA NEWS	435 RIVER ROAD	NORTH TONAWANDA, NEW YORK 14120
VACANT LAND SOUTH OF VAN BORN	THE NEWS-HERALD	1 HERITAGE DRIVE # 100	SOUTHGATE, MICHIGAN 48195

**EXHIBIT E**

**Property Bar Date Notice**

**YOU ARE RECEIVING THIS NOTICE BECAUSE YOU RESIDE NEAR ONE OF THE PROPERTIES LISTED AT THE END OF THIS NOTICE WHICH WAS FORMERLY OWNED BY GENERAL MOTORS OR ONE OF ITS AFFILIATED COMPANIES AND CURRENTLY IS OWNED BY ONE OF THE DEBTORS.**

**THE DEBTORS ARE NOT AWARE OF ANY PARTICULAR HARM TO YOU OR YOUR PROPERTY AS A RESULT OF IT BEING LOCATED NEAR ONE OF THE PROPERTIES LISTED BELOW OR ANY OTHER PARTICULAR REASON WHY YOU MAY HAVE A CLAIM. HOWEVER, IF YOU BELIEVE YOU HAVE A CLAIM, YOU SHOULD FILE A CLAIM ON OR BEFORE FEBRUARY 10, 2010 IN ACCORDANCE WITH THE PROCEDURES SET FORTH IN THIS NOTICE.**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X-----  
In re : Chapter 11 Case No.  
: :  
MOTORS LIQUIDATION COMPANY : 09-50026 (REG)  
f/k/a GENERAL MOTORS CORPORATION, :  
*et al.*, :  
: :  
Debtors. : (Jointly Administered)  
: :  
-----X-----

**NOTICE OF DEADLINE FOR FILING CERTAIN PROOFS OF CLAIM**

TO ALL PERSONS AND ENTITIES WITH  
CLAIMS AGAINST A DEBTOR SET FORTH BELOW:

Name of Debtor	Case Number	Tax Identification Number	Other Names Used by Debtors in the Past 8 Years
Motors Liquidation Company (f/k/a <b>General Motors Corporation</b> )	09-50026	38-0572515	General Motors Corporation GMC Truck Division NAO Fleet Operations GM Corporation GM Corporation-GM Auction Department National Car Rental National Car Sales Automotive Market Research
MLCS, LLC (f/k/a <b>Saturn, LLC</b> )	09-50027	38-2577506	Saturn, LLC Saturn Corporation Saturn Motor Car Corporation GM Saturn Corporation Saturn Corporation of Delaware
MLCS Distribution Corporation (f/k/a <b>Saturn Distribution Corporation</b> )	09-50028	38-2755764	Saturn Distribution Corporation

PLEASE TAKE NOTICE THAT, on December 18, 2009, the United States Bankruptcy Court for the Southern District of New York (the “**Court**”) having jurisdiction over the chapter 11 cases of Motors Liquidation Company (f/k/a **General Motors Corporation**) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”) entered a supplemental order (the “**Supplemental Bar Date Order**”) establishing (i) **February 10, 2010, at 5:00 p.m. (Eastern Time)** (the “**Property Claims Bar Date**”) as the last date and time for each person or entity (including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts) to file a proof of claim based on prepetition claims against any of the Debtors with respect to their person or real property arising from being located adjacent to, or in the proximity of, the properties listed at the end of this notice (a “**Property Proof of Claim**”).

The Supplemental Bar Date Order, the Property Claims Bar Date and the procedures set forth below for the filing of Property Proofs of Claim apply to all such claims against the Debtors that arose prior to **June 1, 2009**, the date on which the Debtors commenced their cases under the United States Bankruptcy Code (the “**Bankruptcy Code**”).

**If you have any questions relating to this Notice, please feel free to contact the Debtors at 1-800-414-9607 or by e-mail at claims@motorsliquidation.com**

**YOU SHOULD CONSULT AN ATTORNEY IF YOU HAVE ANY QUESTIONS, INCLUDING WHETHER YOU SHOULD FILE A PROPERTY PROOF OF CLAIM.**

**1. WHO MUST FILE A PROPERTY PROOF OF CLAIM**

You **MUST** file a **Property Proof of Claim** to vote on a chapter 11 plan filed by the Debtors or to share in any of the Debtors’ estates if you have a claim that arose prior to **June 1, 2009**. Acts or omissions of the Debtors that occurred before **June 1, 2009** may give rise to claims against the Debtors that must be filed by **February 10, 2010**, notwithstanding that such claims may not have matured or become fixed or liquidated or certain prior to **June 1, 2009**.

Pursuant to section 101(5) of the Bankruptcy Code and as used in this Notice, the word “claim” means: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

**YOU SHOULD NOT FILE A PROPERTY PROOF OF CLAIM IF YOU DO NOT HAVE A CLAIM AGAINST THE DEBTORS.**

**THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THAT THE DEBTORS OR THE COURT BELIEVE THAT YOU HAVE A CLAIM.**

## 2. WHEN AND WHERE TO FILE

All Property Proofs of Claim must be filed so as to be actually received on or before February 10, 2010 at the following address:

If by overnight courier or hand delivery to:

The Garden City Group, Inc.  
Attn: Motors Liquidation Company Claims  
Processing  
5151 Blazer Parkway, Suite A  
Dublin, Ohio 43017

If by first-class mail, to:

The Garden City Group, Inc.  
Attn: Motors Liquidation Company  
P.O. Box 9386  
Dublin, Ohio 43017-4286

Or if by hand delivery to:

United States Bankruptcy Court, SDNY  
One Bowling Green  
Room 534  
New York, New York 10004

Property Proofs of Claim will be deemed timely filed only if actually received by The Garden City Group, Inc. or the Court on or before February 10, 2010. Property Proofs of Claim may not be delivered by facsimile, telecopy, or electronic mail transmission.

## 3. WHAT TO FILE

If you file a Property Proof of Claim, your filed Property Proof of Claim must: (i) be written in the English language; (ii) be denominated in dollars; (iii) conform substantially to the form provided with this Notice (“**Proof of Claim Form**”) or Official Bankruptcy Form No. 10; (iv) state the Debtor against which it is filed; (v) set forth with specificity the legal and factual basis for the alleged claim; (vi) include supporting documentation or an explanation as to why such documentation is not available; and (vii) be **signed** by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant.

IF YOU ARE ASSERTING A CLAIM AGAINST MORE THAN ONE DEBTOR, SEPARATE PROPERTY PROOFS OF CLAIM MUST BE FILED AGAINST EACH SUCH DEBTOR AND YOU MUST IDENTIFY ON YOUR PROPERTY PROOF OF CLAIM THE SPECIFIC DEBTOR AGAINST WHICH YOUR CLAIM IS ASSERTED AND THE CASE NUMBER OF THAT DEBTOR’S BANKRUPTCY CASE. A LIST OF THE NAMES OF THE DEBTORS AND THEIR CASE NUMBERS IS SET FORTH ABOVE.

Additional Property Proof of Claim Forms may be obtained at [www.uscourts.gov/bkforms/](http://www.uscourts.gov/bkforms/) or [www.motorsliquidationdocket.com](http://www.motorsliquidationdocket.com).

**YOU SHOULD ATTACH TO YOUR COMPLETED PROPERTY PROOF OF CLAIM FORM COPIES OF ANY WRITINGS UPON WHICH YOUR CLAIM IS BASED. IF THE DOCUMENTS ARE VOLUMINOUS, YOU SHOULD ATTACH A SUMMARY.**

**4. CONSEQUENCES OF FAILURE TO FILE A PROPERTY PROOF OF CLAIM BY THE PROPERTY CLAIMS BAR DATE**

*If you do not file a Property Proof of Claim on or before February 10, 2010 in the appropriate form in accordance with the procedures described in this Notice for any such claim you wish to assert against each of the Debtors, you will be forever prohibited and forbidden from asserting the claim in the future, and each of the Debtors and their respective chapter 11 estates, successors, and property will be forever discharged from and will not be liable or responsible for anything related to the claim and you will not be permitted to vote to accept or reject any chapter 11 plan filed in these chapter 11 cases, receive any distribution in any of the Debtors' chapter 11 cases on account of your claim, or receive further notices with respect to any of the Debtors' chapter 11 cases.*

**A holder of a possible claim against the Debtors should consult an attorney as to whether the holder should file a Property Proof of Claim.**

DATED: December 18, 2009  
New York, New York

BY ORDER OF THE COURT

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
ATTORNEYS FOR DEBTORS AND  
DEBTORS IN POSSESSION

**LIST OF PROPERTIES**

Site Name	Address	City, State Zip
BUICK CITY	902 EAST HAMILTON AVENUE	FLINT, MICHIGAN 48550
FIERO SITE	900 BALDWIN AVENUE	PONTIAC, MICHIGAN 48340
FLINT FLOWTHROUGH WAREHOUSE	4002 JAMES COLE BOULEVARD	FLINT, MICHIGAN 48503
GMPT - FREDERICKSBURG	11032 TIDEWATER TRAIL	FREDERICKSBURG, VIRGINIA 22408
GMPT - LIVONIA	12200 MIDDLEBELT	LIVONIA, MICHIGAN 48150
GMPT - PARMA COMPLEX	5400 CHEVROLET BOULEVARD PO BOX 30098	PARMA, OHIO 44130
GMPT - WILLOW RUN	2930 ECORSE ROAD	YPSILANTI, MICHIGAN 48198
GMVM - MORAINES ASSEMBLY	2601 WEST STROOP ROAD	MORAINE, OHIO 45439
GMVM - PONTIAC ASSEMBLY	2100 SOUTH OPDYKE ROAD	PONTIAC, MICHIGAN 48341
GMVM - WILMINGTON ASSEMBLY	801 BOXWOOD ROAD PO BOX 1512 - 19899	WILMINGTON, DELAWARE 19804
PCC-VALIDATION	200 SOUTH BOULEVARD WEST	PONTIAC, MICHIGAN 48341
SAGINAW NODULAR IRON	2100 VETERANS MEMORIAL PARKWAY	SAGINAW, MICHIGAN 48605
SHREVEPORT PLANT (GMVM & STAMPING)	7600 GENERAL MOTORS BOULEVARD PO BOX 30011 - 71130-0011	SHREVEPORT, LOUISIANA 71130
STAMPING - GRAND RAPIDS	300 36TH STREET SOUTHWEST	WYOMING, MICHIGAN 49548
STAMPING - INDIANAPOLIS	340 WHITE RIVER PARKWAY WEST DRIVE SOUTH 50	INDIANAPOLIS, INDIANA 46206
STAMPING - MANSFIELD	2525 WEST FOURTH STREET PO BOX 2567 - 44906	MANSFIELD, OHIO 44906
STAMPING - PITTSBURGH	1451 LEBANON SCHOOL ROAD	WEST MIFFLIN, PENNSYLVANIA 15122
STAMPING - PONTIAC NORTH CAMPUS	220 EAST COLUMBIA	PONTIAC, MICHIGAN 48340

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----x  
In re : Chapter 11 Case No.  
: :  
MOTORS LIQUIDATION COMPANY, *et al.*, : 09-50026 (REG)  
f/k/a General Motors Corp., *et al.* :  
: :  
Debtors. : (Jointly Administered)  
: :  
-----x

**ORDER GRANTING DEBTORS' EIGHTY-NINTH OMNIBUS  
OBJECTION TO CLAIMS AND ENFORCEMENT OF BAR DATE ORDERS**  
(Late-Filed Claims)

Upon the eighty-ninth omnibus objection to expunge certain claims and motion requesting enforcement of Bar Date Orders,<sup>1</sup> dated September 17, 2010 (the “Eighty-Ninth Omnibus Objection to Claims”), of Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the “Debtors”), pursuant to section 502(b) of title 11, United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “Procedures Order”) [Docket No. 4180], seeking entry of an order disallowing and expunging the Late-Filed Claims on the grounds that such claims were not timely filed, all as more fully described in the Eighty-Ninth Omnibus Objection to Claims; and due and proper notice of the Eighty-Ninth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Eighty-Ninth Omnibus Objection to Claims is in the best

---

<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Eighty-Ninth Omnibus Objection to Claims.

interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Eighty-Ninth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Eighty-Ninth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on **Exhibit “A”** (the “**Order Exhibit**”) annexed hereto under the heading “*Claims to be Disallowed and Expunged*” are disallowed and expunged; and it is further

ORDERED that, if applicable, the Eighty-Ninth Omnibus Objection to Claims is adjourned with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Objection Adjourned*” (the “**Adjourned Claims**”) to the date indicated on the Order Exhibit, subject to further adjournments (such actual hearing date, the “**Adjourned Hearing Date**”), and the Debtors’ response deadline with respect to the Adjourned Claims shall be 12:00 noon (Eastern Time) on the date that is three (3) business days before the Adjourned Hearing Date; and it is further

ORDERED that, if applicable, the Eighty-Ninth Omnibus Objection to Claims is withdrawn with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Objection Withdrawn*”; and it is further

ORDERED that, if applicable, the Eighty-Ninth Omnibus Objection to Claims is withdrawn with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Claim Withdrawn*” as those claims have been withdrawn by the corresponding claimant; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the

validity, allowance, or disallowance of, and all rights to object on any basis are expressly reserved with respect to any claim listed on Exhibit "A" annexed to the Eighty-Ninth Omnibus Objection to Claims under the heading "*Claims to be Disallowed and Expunged*" that is not listed on the Order Exhibit annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York  
\_\_\_\_\_, 2010

---

United States Bankruptcy Judge